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Attorneys for Defendants TaxMasters,
Inc. and TMIRS Enterprises, Ltd.

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

JEFFERY DELONG and DENNIS
HOLMES, individually and on behalf
of all others similarly situated,

Plaintiffs,

vs.

TAXMASTERS, INC., a Nevada
Corporation, TMIRS ENTERPRISES,
LTD., a Texas Partnership, and DOES 1
through 50, inclusive,

Defendants.

Case No: CV11-01431-ODW-AGR

DECLARATION OF MATTHEW D.
MCMILLAN IN SUPPORT OF
TAXMASTERS' EX PARTE
APPLICATION FOR ORDER
SHORTENING TIME FOR
HEARING TAXMASTERS'
MOTION FOR CLARIFICATION

Date: TBD
Time: TBD
Courtroom: 11
Judge: Hon. Otis D. Wright, II

Action Filed: February 16, 2011

1 I, Matthew D. McMillan, declare as follows:

2 1. I am an attorney of record for Defendants, TaxMasters, Inc. and TMIRS
3 Enterprises, Ltd. (collectively, "TaxMasters") in the above-entitled action.

4 2. I have personal knowledge of the facts contained in this declaration. I am
5 familiar with such facts based on my personal involvement with all aspects of this
6 case since 2011, my communications with TaxMasters in this litigation, and my
7 review of and familiarity with the pleadings filed in this litigation.

8 3. Attached hereto as **Exhibit 1** is a true and correct copy of the Order to
9 Show Cause regarding the Amount in Controversy issued in this action on October
10 31, 2011.

11 4. Attached hereto as **Exhibit 2** is a true and correct copy of a meet and
12 confer correspondence dated November 3, 2011 from counsel for TaxMasters to
13 counsel for Plaintiffs.

14 5. Attached hereto as **Exhibit 3** is a true and correct copy of an email
15 correspondence dated November 4, 2011 from Plaintiffs' counsel to counsel for
16 TaxMasters.

17
18 I declare under penalty of perjury that the foregoing is true and correct.

19 Executed in San Diego, California on November 4, 2011.

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21 DATED: November 4, 2011

Caufield & James, LLP

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23 /s/ Matthew McMillan
Matthew D. McMillan, Esq.
24 Ken E. James, Esq.
Jeffery L. Caufield, Esq.
25 Attorneys for Defendants Taxmasters,
Inc. and TMIRS Enterprises, Ltd.
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